KH

2C VBKK/C SKD

> SKD/KKS BC/RVD/JM

SI/DA

4

BEFORE THE

PUBLIC UTILITIES COMMISSION

OF THE STATE OF HAWAII

In the Matter of the Application of

HAWAIIAN ELECTRIC COMPANY, INC.

For Approval of Rate Increases and
Revised Rate Schedules and Rules

O

DOCKET NO. 2006-0386

DEPARTMENT OF DEFENSE'S FIRST
SET OF INFORMATION REQUESTS
TO HAWAIIAN ELECTRIC COMPANY, INC.

AND

CERTIFICATE OF SERVICE

RANDALL Y.K. YOUNG Associate Counsel (Code 09C) Naval Facilities Engineering Command, Pacific 258 Makalapa Drive, Suite 100 Pearl Harbor, HI 96860-3134 Telephone (808) 474-5514

ATTORNEY FOR DEPARTMENT OF DEFENSE

OF THE STATE OF HAWAII

In the Matter of the Application of		
HAWAIIAN ELECTRIC COMPANY, INC.)	DOCKET NO. 2006-0386
)	
For Approval of Rate Increases and)	
Revised Rate Schedules and Rules)	
	_)	

DEPARTMENT OF DEFENSE'S FIRST SET OF INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY, INC.

COMES NOW, DEPARTMENT OF DEFENSE ("Applicant") by and through its undersigned attorney and hereby submits its First Set of Information Requests to Hawaiian Electric Company, Inc. ("HECO").

DATED: Honolulu, Hawaii, April 19, 2007.

RANDALL Y.K. YOUNG
Associate Counsel (Code 09C)
Naval Facilities Engineering Command, Pacific

258 Makalapa Drive, Suite 100 Pearl Harbor, HI 96860-3134

Telephone (808) 474-5514

ATTORNEY FOR DEPARTMENT OF DEFENSE

DOCKET NO. 2006-0386

DEPARTMENT OF DEFENSE'S FIRST

SET OF INFORMATION REQUESTS

TO HAWAIIAN ELECTRIC COMPANY, INC.

INSTRUCTIONS

In order to expedite and facilitate Department of Defense's review and analysis in the above matter, the following is requested:

- For each response, HECO should identify the person who is responsible for preparing the
 response as well as the witness who will be responsible for sponsoring the response should there
 be an evidentiary hearing;
- 2. Unless otherwise specifically requested, for applicable schedules or workpapers, HECO should provide hard copies of each schedule or workpaper together with one copy of each such schedule or workpaper on electronic media in a mutually agreeable format (e.g., Excel and Quattro Pro, to name two examples); and
- 3. When an information request makes reference to specific documentation used by HECO to support its response, it is not intended that the response be limited to just the specific document referenced in the request. The response should include any non-privileged memoranda, internal or external studies, assumptions, HECO instructions, or any other relevant authoritative source which HECO used.
- 4. Should HECO claim that any information is not discoverable for any reason:
 - State all claimed privileges and objections to disclosure;
 - b. State all facts and reasons supporting each claimed privilege and objection;
 - c. State under what conditions HECO is willing to permit disclosure to Department of Defense (e.g., protective agreement, review at business offices, etc.); and

- d. If HECO claims that a written document or electronic file is not discoverable, besides complying with subparagraphs 4(a-c), identify each document or electronic file, or portions thereof, that HECO claims are privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).
- 5. In order that DOD and HECO can avoid duplication of discovery already issued by other parties, we would appreciate receiving HECO's responses to DOD-1 and 2 on an expedited basis. Please provide each response in electronic format (if available) as well as paper. Please provide two copies of each response, with one copy going directly via overnight delivery to DOD at the following address:

Dr. Khojasteh Davoodi
EFACHES
1322 Patterson Avenue, S.E.
Building 33, Floor 3, Room/Cube 33-3002
Washington, D.C. 20374
E-mail: Khojasteh.Davoodi@navy.mil
Ph. (202) 685-3319

and one copy going directly via overnight delivery to DOD's consultant at the following address:

Ralph Smith Larkin & Associates 15728 Farmington Road Livonia, MI 48154 Fax: 734-522-1410

Email: RSmithLA@aol.com

Ph. (734) 522-3420

DEPARTMENT OF DEFENSE'S FIRST SET OF INFORMATION REQUESTS

TO HAWAIIAN ELECTRIC COMPANY, INC.

DOCKET NO. 2006-0386

The following information requests are directed to HECO.

- DOD-1. Please provide a copy of all of the data requests HECO has received from other parties to date.
- DOD-2. Please provide HECO's responses to all Consumer Advocate and other parties' data requests issued to date.
- DOD-3. Please provide a copy of all discovery requests issued by other parties from this point forward, and also provide HECO's responses to such discovery requests at the time the responses are provided to the issuing parties.
- DOD-4. To the extent not filed by HECO as part of its filing or in the response to DOD-2, please provide all Excel files and supporting workpapers for HECO witness testimony and their exhibits.

CERTIFICATE OF SERVICE

I hereby certify that one copy of the foregoing <u>DEPARTMENT OF DEFENSE'S FIRST SET OF</u> INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY, INC. was duly served upon the following parties, by personal service, hand-delivery, and/or U.S. mail, postage prepaid, and properly addressed pursuant to HAR sec. 6-61-21(d).

William A. Bonnet Vice President, Government and Community Affairs Hawaiian Electric Company, Inc. P.O. Box 2750 Honolulu, Hawaii 96840-0001

Dean K. Matsuura **Director, Regulatory Affairs** Hawaiian Electric Company, Inc. P.O. Box 2750 Honolulu, Hawaii 96840-0001

Thomas W. Williams, Jr., Esq. Peter Y. Kikuta, Esq. Goodsill Anderson Quinn & Stifel 1800 Alii Place 1099 Alakea Street Honolulu, Hawaii 96813

Department of Commerce and Consumer Affairs State of Hawaii **Division of Consumer Advocacy** 335 Merchant Street, Room 326 Honolulu, Hawaii 96813

2 Copies

DATED: Honolulu, Hawaii, April 19

Associate Counsel

Naval Facilities Engineering Command,

Pacific